## ORIGINAL

## INTERVENTION



## BEFORE THE ARIZONA CORPORATION COMMISSION

KRISTIN K. MAYES
Chair
GARY PIERCE
Commissioner
PAUL NEWMAN
Commissioner
SANDRA D. KENNEDY
Commissioner
BOB STUMP

Commissioner

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Arizona Corporation Commission DOCKETED

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T-01051B-10-0194 JOINT NOTICE AND APPLICATION OF DOCKET NOS. T-02811B-10-<del>109</del>40154 **OWEST CORPORATION, QWEST** T-04190A-10-<del>109</del>4 0194 COMMUNICATIONS COMPANY, LLC, QWEST LD CORP., EMBARQ COMMUNICATIONS, T-20443A-10-<del>109</del>4 0194 T-03555A-10-1094 0194 INC. D/B/A CENTURY LINK T-03902A-10-<del>1094</del> 0194 COMMUNICATIONS, EMBARQ PAYPHONE SERVICES, INC. D/B/A CENTURYLINK, AND CENTURYTEL SOLUTIONS, LLC FOR APPROVAL OF THE PROPOSED MERGER OF APPLICATION TO INTERVENE THEIR PARENT CORPORATIONS OWEST OF INTEGRA TELECOM COMMUNICATIONS INTERNATIONAL INC. AND CENTURYTEL, INC.

Eschelon Telecom of Arizona, Inc., Electric Lightwave, LLC, and Mountain

Telecommunications of Arizona, Inc., each doing business as Integra Telecom, and collectively

"Integra," hereby request permission to intervene in accordance with Rule 14-3-105 of the

Arizona Corporation Commission Rules of Practice and Procedure, and in support of their
request state as follows:

1. Through three wholly owned subsidiaries, Integra Telecom, Inc. provides local exchange, intraexchange, and interexchange telecommunications services in Arizona. Those

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three subsidiaries are Eschelon Telecom of Arizona, Inc., Electric Lightwave, LLC, and Mountain Telecommunications of Arizona, Inc.

- 2. Eschelon Telecom of Arizona, Inc., Electric Lightwave, LLC, and Mountain Telecommunications of Arizona, Inc. are parties to interconnection agreements with Qwest Corporation, which are subject to section 252(e) of the Telecommunications Act of 1996 ("Act") and which set forth the terms and conditions under which Integra and Qwest interconnect their communications networks. Integra purchases unbundled network elements and other wholesale services from Qwest and competes with Qwest in the retail market. Integra has a direct and substantial interest in ensuring that Qwest, under new ownership, will provide unbundled network elements and wholesale services as required by the Act and pursuant to the interconnection agreements.
- 3. Integra's participation in this proceeding will not unduly broaden the nature or scope of the Commission's inquiry.
- 4. If Integra is granted intervention, pleadings and other communications should be sent to:

Joan S. Burke Law Office of Joan S. Burke 1650 North First Avenue Phoenix, Arizona 85003 Telephone: (602) 535-0396 Joan@jsburkelaw.com Karen L. Clauson Vice President, Law & Policy Integra Telecom 6160 Golden Hills Drive Golden Valley, MN 55416-1020 klclauson@integratelecom.com

Gregory Merz GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A. 500 IDS Center, 80 South Eight St. Minneapolis, MN 55402 Voice: (612) 632-3257

Fax: (612) 632-4257

Email: gregory.merz@gpmlaw.

Accordingly, Integra requests that the Arizona Corporation Commission issue an order granting Integra's request for intervention.

RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of June 2010.

Joan S. Burke

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Electronic Service Only Preferred (ESOP)

Attorney for Integra Telecom.

Original and 13 copies of the foregoing Filed this The day of June 2010 with Docket Control

Docket Control Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

COPIES of the foregoing hand-delivered this  $1^{+}$  day of June 2010, to:

Janice Alward, Chief Counsel Legal Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

Maureen Scott Legal Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007 COPIES of the foregoing mailed this  $\sqrt[7]{100}$  day of June 2010, to:

Jeffrey W. Crockett Bradley S. Carroll One Arizona Center 400 East Van Buren Phoenix, Arizona 85004-2202

Norman Curtright Corporate Counsel Qwest Corporation 20 E. Thomas Road, 16<sup>th</sup> Floor Phoenix, Arizona 85012

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